#### IMPLEMENTING THE TITLE X PROGRAM GUIDELINES: PROGRAM REVIEW TOOL

#### **BACKGROUND:**

In 2014, the Office of Population Affairs (OPA) released updated Title X family planning program guidelines, hereafter referred to as "The Guidelines." These Guidelines consist of two parts:

- 1. The Title X *Program Requirements*, which lays out the Federal statutory and regulatory requirements of the Title X program.
- 2. Providing Quality Family Planning Services: Recommendations of CDC and the U.S. Office of Population Affairs (QFP), which provides clinical recommendations for how to provide family planning services in a manner that is consistent with the best available scientific evidence.

While this tool is intended for use by Office of Population Affairs staff and consultants, it may also be used by Title X grantees as a self-assessment and can also be adapted for use by grantees for monitoring their sub-recipients and service sites.

The tool describes strategies that grantees may use to operationalize applicable Title X statutory and regulatory requirements and lays out the minimum expectations for compliance. The document also illustrates how a grantee can implement QFP in a way that ensures quality care is provided throughout the Title X project.

This tool focuses on Sections 8-13 of the *Program Requirements* because these are the sections that outline the key operational elements of a Title X family planning services project.

In cases where the grantee relies on other entities (sub-recipients) for the provision of family planning services, the grantee is responsible for ensuring that sub-recipients are in compliance with the Title X program requirements.

There are two types of assessments that will be generated by OPA upon completion of the program review tool:

#### 1. Title X Program Requirements Assessment: Met/Not Met/N/A

This assessment relates to the grantee's compliance with the statute and regulations. For these requirements, the grantee will receive an assessment of compliance and will receive a rating of "met"," not met", or "N/A" (not applicable) [In certain instances, criteria are required program elements, therefore the "N/A" score is provided as an option.] The evidence that minimum criteria have been met will be determined based on both grantee and sub-recipient records and observation at grantee administrative offices and selected service sites as part of the monitoring process. Grantees will be evaluated using the list of evidence items in the implementation strategy column. These are minimum elements that the grantee should have on site or otherwise readily available as evidence that the project meets requirements. Evidence may include but is not limited to, policies, procedures, protocols, documentation of training, direct visual confirmation per consultants and/or regional office staff to ensure that what is contained in written policy or instructions is actually being carried out, or any other form of documentation that substantiates that the project is operating in accordance with the Title X Program Requirements. For questions that apply to the grantee, scoring option A (see right) will be used. For questions that apply to the Service Sites, scoring option B will be used. The "grantee" line for option B serves as a cumulative score; to receive a cumulative "Met" score, all service sites must meet the criterion.

Option A: Questions Applying to Grantee Only							
Met	Not Met		N/A				
Comments:							
<b>Option B:</b> Questions Applying to Grantee <b>and</b> Sub-Recipient/Service Sites							
Met Not Met N/A							
Grantee		П	П				

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### 2. QFP Quality Assessment: Highly Developed, Developed, Being Developed or Needs Development

This assessment reflects the extent to which the grantee has implemented key aspects of QFP within each item. Sections within

the document identify where there is a relationship between the Program Requirements and QFP. Grantees will be assessed using the list of items in the implementation column. Quality assessments will be determined based on the number of items demonstrated by the grantee. These examples do not represent an exhaustive list and grantees may propose additional items. The color-coded assessment will serve as a tool for OPA and the grantee to recognize achievement in the individual sections assessed as well as identify areas in need of improvement and/or technical assistance.

Quality Assessment			
Highly Developed	All Quality Indicators Met and Evidence of Best Practices or Highly Innovative Approaches		
Fully Developed	All Quality Indicators Met		
Partially Developed	Half or more Quality Indicators Met		
Being Developed	One or More but less than half of Quality Indicators Met		
Needs Development	No Quality Indicators Met		

Site A

Site B

Site C

Comments:

#### **DEFINITIONS**

Term	Definition
Title X Program Requirement	Requirements applicable to the Title X program, as set out in the Title X statute and implementing regulations (42 CFR part 59, subpart A), and in other applicable Federal statutes, regulations and policies.
Implementation Strategy	Implementation strategy includes the grantee's mechanism for ensuring compliance with Title X requirements. This includes providing evidence on site or otherwise readily available to document and demonstrate that the project meets requirements. The examples listed in the program review tool do not represent an exhaustive list. Evidence may include but is not limited to, policies, procedures, protocols, documentation of training, or any other form of documentation that substantiates that the project is operating in accordance with the Title X Program Requirements and Recommendations for Providing Quality Family Planning Services (QFP).
Family Planning Services	Services that are directly related to preventing unintended pregnancies as well as achieving planned pregnancies that result in healthy birth outcomes. This includes contraceptive services, pregnancy testing and counseling, services to assist with achieving pregnancy, basic infertility services, STD services, and other preconception health services. These services should be offered to both women and men in accordance with QFP. Title X providers should be trained and equipped to offer these services.
Related Preventive Health Services	Services that are considered to be beneficial to reproductive health, are closely linked to family planning services, and are appropriate to deliver in the context of a family planning visit but do not contribute directly to achieving or preventing pregnancy (e.g., breast and cervical cancer screening). Title X providers should be trained and equipped to offer these services.
Other Preventive Health Services	These include other preventive health services for women and men that are not listed above. Screening for lipid disorders, skin cancer, colorectal cancer, or osteoporosis are examples. Although important in the context of primary care, these have no direct link to family planning services. Clients should be provided referrals for these as well as other primary care services, but they should not be considered a Title X service.

### ASSESSMENT OF IMPLEMENTATION STRATEGY

A Administrative Reviewer	
Clinical Reviewer	These initials in the Implementation Strategy Column identify which reviewer will complete the assessment for that element.
F Financial Reviewer	milet reviewer will complete the accordance for that clotherit.

#### **PROGRAM REVIEW TOOL**

#### **8. PROJECT MANAGEMENT AND ADMINISTRATION**

## **8.1 Voluntary Participation**

Title X Program Requirement	Implementation Strategy	Assessment					
8.1.1							
Family planning services are to be provided solely on a voluntary basis (Sections 1001 and 1007, PHS Act;	Grantees should institutionalize administrative procedures (i.e., staff training, clinical protocols, and consent forms) to ensure clients receive services on a voluntary basis.						
42 CFR 59.5 (a)(2)).	Evidence that this requirement has been met includes  1. A Grantee has written policies and		NI. ( NA. (				
(3)(2)	Grantos mas written pensios and	Met	Not Met				
Clients cannot be coerced to accept	procedures that specify services are to be						
services or to use or not use any particular method of family planning (42 CFR 59.5 (a)(2)).	provided on a voluntary basis. If the grantee does not provide all services directly, and subcontracts for services to be performed, the grantee's policies and procedures and contract language specifies that all sub-recipients provide services solely on a voluntary basis.	Comments:					

Title X Program Requirement	lmp	lementation Strategy	Assessment			
	There is evidence of the grantee's oversight of sub-recipients and service sites including:					
	2.	A Documentation at service sites		Met	Not Met	
		demonstrates (e.g., staff circulars, training curriculum and records) staff has been	Grantee			
		informed at least once during the current project period that services must be provided	Site A			
		on a voluntary basis.	Site B			
			Site C			
			Comments:			
	3.	A Administrative policies used by service		Met	Not Met	
		sites include a written statement that clients may not be coerced to use contraception, or to	Grantee			
		use any particular method of contraception or service.	Site A			
			Site B			
			Site C			
			Comments:			

Title X Program Requirement	Impl	ementation Strategy	Assessment		
	4.	A General consent forms or other		Met	Not Met
		documentation at service sites inform clients that services are provided on a voluntary basis.	Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		
	4.a.	demonstrates that each client has signed a general consent form or other documentation that demonstrates they have received assurance that services are voluntary.  Sit		Met	Not Met
			Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		
Additional Notes:	•				

Title X Program Requirement	Implementation Strategy	Assessment			
8.1.1 LINK TO QFP:					
A core premise of Recommendations for quality services are client-centered, who	Quality Assessment Score:				
The key principles of providing quality, maintain rapport with the client, 2) asset	Quality Rating Quality Indicators Met				
accordingly, 3) work with the client inte	Highly Developed All (5)+				
•	the client, and 5) confirm client understanding.	Fully Developed All (5)			
	oping counseling protocols that ensure voluntary	Partially Developed Half or More (3-4)  One or More but less			
participation. (See Appendix C of QFP	for additional detail.)	Being Developed One of More but less than half (1-2)			
		Needs Development None			
	1. C Observation of counseling process, including I&E material provided, at service sites demonstrates that the <b>five</b> principles of quality counseling are utilized when providing family planning services.	Score each of the five principles as a quality indicator above.  Comments:			
Additional Notes:					

Implementation Strategy	Assessment	t				
and consent forms) to ensure clients' receipt of family prerequisite to receipt of other services from the service Evidence that this requirement has been met includes	planning service site.	ices is not us				
1. A The grantee has a written policy that prohibits their service sites, and any subrecipient service sites from making the acceptance of family planning services a prerequisite to the receipt of any other services.	Met  Comments:	Not Met  □	N/A (no sub- recipients)			
There is evidence of the grantee's oversight of sub-recipients/service sites including:						
2. A Documentation at the service site(s) (e.g.,		Met	Not Met			
staff circulars, training curriculum) indicates staff has been informed at least once during the current project period that a client's receipt of family planning services may not be used as a prerequisite to receipt of any other services offered by the service site.	Grantee					
	Site A					
	Site B					
	Site C					
	Comments:					
	Grantee should institutionalize administrative proceduland consent forms) to ensure clients' receipt of family prerequisite to receipt of other services from the service Evidence that this requirement has been met included 1.  A The grantee has a written policy that prohibits their service sites, and any subrecipient service sites from making the acceptance of family planning services a prerequisite to the receipt of any other services.  There is evidence of the grantee's oversight of subrecesservices.  A Documentation at the service site(s) (e.g., staff circulars, training curriculum) indicates staff has been informed at least once during the current project period that a client's receipt of family planning services may not be used as a prerequisite to receipt of any other services	Grantee should institutionalize administrative procedures (e.g., staff and consent forms) to ensure clients' receipt of family planning serv prerequisite to receipt of other services from the service site.  Evidence that this requirement has been met includes:  1. A The grantee has a written policy that prohibits their service sites, and any subrecipient service sites from making the acceptance of family planning services a prerequisite to the receipt of any other services.  There is evidence of the grantee's oversight of sub-recipients/services.  Comments:  There is evidence of the grantee's oversight of sub-recipients/service staff circulars, training curriculum) indicates staff has been informed at least once during the current project period that a client's receipt of family planning services may not be used as a prerequisite to receipt of any other services offered by the service site.  Site A Site B Site C	Grantee should institutionalize administrative procedures (e.g., staff training, clin and consent forms) to ensure clients' receipt of family planning services is not us prerequisite to receipt of other services from the service site.  Evidence that this requirement has been met includes:  1. A The grantee has a written policy that prohibits their service sites, and any subrecipient service sites from making the acceptance of family planning services a prerequisite to the receipt of any other services.  There is evidence of the grantee's oversight of sub-recipients/service sites included as the current project period that a client's receipt of family planning services may not be used as a prerequisite to receipt of any other services offered by the service site.			

Title X Program Requirement	Impl	ementation Strategy	Assessment		
	3.	A Administrative policies at service sites		Met	Not Met
		include a written statement that receipt of family planning services is not a prerequisite to	Grantee		
		receipt of any other services offered by the service site.	Site A		
			Site B		
			Site C		
			Comments:		
	4.	4. A General consent forms or other documentation provided to clients states that receipt of family planning services is not a prerequisite to receipt of any other services offered by the service site.		Met	Not Met
			Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		

Title X Program Requirement	Impl	ementation Strategy	Assessment		
	5.	Medical record review demonstrates that		Met	Not Met
		each client has signed a general consent form stating receipt of family planning services is not	Grantee		
		a prerequisite to receipt of any other services offered.	Site A		
			Site B		
			Site C		
			Comments:		
Additional Notes:					

Title X Program Requirement	Impl	lementation Strategy	Assessme	nt				
8.1.3	•		•					
Personnel working within the family		vidence that this requirement has been met includes:						
planning project must be informed that they may be subject to	1.	A Grantee has written policies and	Me	t	Not Met			
prosecution if they coerce or try to		procedures that require that all staff of the						
coerce any person to undergo an		grantee, sub-recipients, and service sites is informed that they may be subject to	Comments:					
abortion or sterilization procedure		prosecution if they coerce or try to coerce any						
(Section 205, Public Law 94-63, as set out in 42 CFR 59.5(a)(2) footnote		person to undergo an abortion or sterilization						
1).		procedure.						
.,,	2.	A Documentation at the grantee level	Me	t	Not	Met		
		demonstrates that staff has been informed at						
		least once during the current project period that they are subject to this requirement.	Comments:					
	3.	they are subject to this requirement.						
		A Documentation at sub-recipients and		Met	Not Met	N/A		
		service sites (e.g., staff circulars, training				(no sub- recipients)		
		records) demonstrates that staff has been	Grantee					
		informed at least once during the current project period that they are subject to this						
		requirement.	Site A					
			Site B					
			Site C					
			Comments:					

### **8.2 Prohibition of Abortion**

Title X Program Requirement	Impl	ementation Strategy	Assessment			
8.2						
Title X grantees and sub-recipients must be in full compliance with Section 1008 of the Title X statute and 42 CFR 59.5(a)(5), which prohibit abortion as a method of family planning.	Systems must be in place to assure adequate separation of any non-Title X activities from the Title X project.  Grantee has documented processes to ensure that they and their sub-recipients are in compliance with Section 1008. Grantees should include language in sub-recipient contracts addressing this requirement.					
	Evid	ence that this requirement has been met includes	:			
	1.	A Grantee has written policies and procedures that prohibit sub-recipients and/or service sites from providing abortion as part of the Title X project.	Met  ☐ Comments:		Not Met □	
	2.	A Grantee includes language in sub-recipient contracts addressing this requirement.	Met	Not Met	N/A (no sub- recipients)	
			Comments:			

Title X Program Requirement	Impl	ementation Strategy	Assessmen	t		
	Ther	re is evidence of the grantee's oversight of sub-red	cipients and s	ervice	sites includ	ding:
	3.	Financial documentation at service sites demonstrates that Title X funds are not being used for abortion services and adequate		Met	Not Met	N/A (no sub- recipients)
		separation exists between Title X and non-Title	Grantee			
		X activities.	Site A			
			Site B			
			Site C			
			Comments:			
Additional Notes:	l .					

## 8.3 Structure and Management

Title X Program Requirement	Implementation Strategy	Assessment						
8.3.1								
	Evidence that this requirement has been met includes:							
agreement with each sub-recipient and establish written standards and guidelines for all delegated project activities consistent with the appropriate section(s) of the Title X Program Requirements, as well as other applicable requirements (45 CFR parts 74 and 92).	1. A Grantee has written agreements documenting that any entity(s) carrying out the scope of the contract do so in accordance with Title X and other applicable federal requirements.	Met  Comments:	Not Met	N/A (no subrecipients)				

Title X Program Requirement	Impl	ementation Strategy	Assessment			
8.3.2						
If a sub-recipient wishes to subcontract any of its responsibilities or services, a written agreement that is consistent with Title X Program Requirements and approved by the grantee must be maintained by the sub-recipient (45 CFR parts 74 and 92).	Evid	vidence that this requirement has been met includes:				
	1.	A Grantee has a signed agreement with any sub-recipient who subcontracts for responsibilities or services, requiring the sub-recipient to include compliance with Title X requirements in their subcontracts.	Met  Comments:	Not Met	N/A (no sub- recipients)	
	2.	A Documentation shows the Grantee has approved sub-recipient subcontracts.	Met  Comments:	Not Met	N/A (no sub- recipients)	
	3.	A Review of Grantee and sub-recipient monitoring reports demonstrates that the grantee ensures that the sub-recipient is monitoring the entity for compliance with Title X requirements.	Met  Comments:	Not Met	N/A (no sub- recipients)	

Title X Program Requirement	Implementation Strategy	Assessment
8.3.3		
The grantee must ensure that all	Evidence that this requirement has been met includes	:
services purchased for project participants will be authorized by the project director or his designee on the project staff (42 CFR 59.5(b)(7)).	1. Policies clearly indicate the approval process for any services that are purchased for participants.	Met Not Met  ☐  Comments:
	2. Documentation of purchases demonstrates that the grantee's established policies and procedures are followed.	Met Not Met  Comments:

Title X Program Requirement	Implementation Strategy	Assessment					
8.3.4							
	Evidence that this requirement has been met includes:						
provided through a contract or other similar arrangement are paid for under agreements that include a schedule of	Grantee contracts clearly indicate the schedule of rates and payment procedures for	Met	Not Met	N/A (no contracts)			
rates and payment procedures	services.						
maintained by the grantee. The grantee must be prepared to substantiate that these rates are reasonable and necessary (42 CFR 59.5(b)(9)).		Comments:					
	2. The grantee can substantiate that the rates	Met	Not Met	N/A (no contracts)			
	are reasonable and necessary. This includes demonstrating the process and/or rationale						
	used to determine payments, examples of financial records, applicable internal controls.	Comments:					
8.3.5							
Sub-recipient agencies must be given	Evidence that this requirement has been met includes:						
an opportunity to participate in the establishment of ongoing grantee	Grantee policies identify the mechanism(s) used to involve sub- recipient agencies in the	Met	Not Met	N/A (no contracts)			
policies and guidelines (42 CFR 59.5 (a)(10)).	development of policies and guidelines.						
		Comments:					

Title X Program Requirement	Imp	lementation Strategy	Assessment		
	2.	A Documentation exists and may include meeting minutes, conference calls, and webinars that demonstrates that sub-recipients participate in this process as indicated in the grantee policy.	Met  Comments:	Not Met	N/A (no contracts)
8.3.6					
The grantee and each sub-recipient	Evid	ence that this requirement has been met includes	:		
must maintain a financial management system that meets Federal standards, as applicable, as well as any other requirements imposed by the Notice of Award, and which complies with Federal standards that will support effective control and accountability of funds, as	1.	Grantee financial policies and procedures can be referenced back to federal regulations as applicable.	Met  Comments:		Not Met
required (45 CFR parts 74.20 and 92.20).	2.	F Grantee financial records and oversight	Met		Not Met
<i>32.20</i> ).		documentation demonstrates that the financial management practices within all project sites are aligned with Title X and other applicable regulations and grants requirements.	Comments:		
Additional Notes:	•				

### 8.4 Charges, Billings, and Collections

Title X Program Requirement	Implementation Strategy	Assessment					
8.4.1							
Clients whose documented income is at or below 100% of the Federal Poverty Level (FPL) must not be charged, although projects must bill all third parties authorized or legally obligated to pay for services (Section 1006(c)(2), PHS Act; 42 CFR 59.5(a)(7)).	Grantee has policies and procedures assuring that clients whose documented income is at or below 100% FPL are not charged for services and that third party payers are billed.	Met  Comments:		Not Met			
Although not required to do so, grantees that have lawful access to	There is evidence of the grantee's oversight of sub-recipients/service sites including:						
other valid means of income verification because of the client's	2. Financial documentation at the service site(s) indicates clients whose documented income is at or below 100% FPL are not		Met	Not Met			
participation in another program may use those data rather than re-verify		Grantee					
income or rely solely on the client's	charged for services.	Site A					
self-report.		Site B					
		Site C					
		Comments:					

Title X Program Requirement	Imp	lementation Strategy	Assessment		
	3.	Financial documentation at the service		Met	Not Met
		site(s) indicates that if a third party is authorized or legally obligated to pay for services, the	Grantee		
		project has billed accordingly.	Site A		
			Site B		
			Site C		
			Comments:		
	4.	F Service sites follow a written policy and procedure for verifying client income that is aligned with Title X requirements.		Met	Not Met
			Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		

Title X Program Requirement	Impl	lementation Strategy	Assessment			
	5.	Service site policy and procedures for verifying client income does not present a		Met	Not Met	
		barrier to receipt of services.	Grantee			
			Site A			
			Site B			
			Site C			
			Comments:			
8.4.2  A schedule of discounts, based on ability to pay, is required for individuals with family incomes	Evid	Craimed ride pointing and procedures			Not Met	
between 101% and 250% of the Federal Poverty Level (FPL) (42 CFR 59.5(a)(8)).		requiring that a schedule of discounts be developed for services provided in the project and updated periodically to be in line with the FPL.	Comments:			

Title X Program Requirement	lmp	lementation Strategy	Assessment				
	There is evidence of the grantee's oversight of sub-recipients/service sites including:						
	2.	F Service site documentation indicates client income is assessed and discounts are		Met	Not Met		
		appropriately applied to the cost of services.	Grantee				
			Site A				
			Site B				
			Site C				
			Comments:				
8.4.3							
Fees must be waived for individuals	Evic	Evidence that this requirement has been met includes:					
with family incomes above 100% of the FPL who, as determined by the	1.	F Grantee has policies and procedures that	Met		Not Met		
service site project director, are		require sub-recipients to have a process to refer clients (or financial records) to the service site					
unable, for good cause, to pay for family planning services (42 CFR 59.2).		director for review and consideration of waiver of charges.	Comments:				

Title X Program Requirement	Imp	lementation Strategy	Assessment		
	2.	Documentation at the service site		Met	Not Met
		demonstrates a determination is made by the service site director, is documented and the	Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		
8.4.4					
For persons from families whose	Evid	ence that this requirement has been met includes	:		
income exceeds 250% of the FPL, charges must be made in accordance	1.	Grantee has documented policies and	Met		Not Met
with a schedule of fees designed to recover the reasonable cost of		procedures requiring sub-recipients and service sites to have a sound rationale and process for			
providing services. (42 CFR	determining the cost of services	Comments:			
59.5(a)(8)).					

Title X Program Requirement	Impl	lementation Strategy	Assessment				
	2.	Financial records indicate client income is assessed and that charges are applied		Met	Not Met		
		appropriately to recover the cost of services.	Grantee				
			Site A				
			Site B				
			Site C				
			Comments:				
8.4.5							
Eligibility for discounts for un-	Evidence that this requirement has been met includes:						
emancipated minors who receive confidential services must be based	1.	1. F Grantee policies require service sites to have a process for determining whether a minor is seeking confidential services and stipulates	Met		Not Met		
on the income of the minor (42 CFR 59.2).							
39.2).		that charges to adolescents seeking confidential services will be based solely on the	Comments:				
		adolescent's income.					

Title X Program Requirement	Impl	lementation Strategy	Assessment				
	There is evidence of the grantee's oversight of sub-recipients/service sites including:						
	2.	Client records at service sites indicate		Met	Not Met		
		appropriate implementation of policy.	Grantee				
			Site A				
			Site B				
			Site C				
			Comments:				
0.40							
8.4.6	T						
Where there is legal obligation or authorization for third party	Evidence that this requirement has been met includes:						
reimbursement, including public or	1.	F Grantee policies and procedures require	Met		Not Met		
private sources, all reasonable efforts must be made to obtain third party		that all project sites bill insurance in accordance with Title X regulations.					
payment without the application of any discounts (42 CFR 59.5(a)(9)).		J	Comments:				
Family income should be assessed before determining whether copayments or additional fees are charged. With regard to insured clients, clients whose family income is at or below 250% FPL should not pay more (in copayments or additional fees) than what they would otherwise pay when the schedule of discounts is applied.							

Title X Program Requirement	lmp	lementation Strategy	Assessment			
	There is evidence of the grantee's oversight of sub-recipients/service sites including:					
	2.	The grantee can demonstrate that it (and/or		Met	Not Met	
		its sub-recipients) has contracts with insurance providers, including public and private sources.	Grantee			
			Site A			
			Site B			
			Site C			
			Comments:			
	3.	3. Financial records indicate that clients with family incomes between 101%-250% FPL do not pay more in copayments or additional fees than they would otherwise pay when the schedule of discounts is applied.		Met	Not Met	
	nc tha		Grantee			
			Site A			
			Site B			
			Site C			
			Comments:			

Title X Program Requirement	Imp	lementation Strategy	Assessment					
8.4.7								
Where reimbursement is available	Evid	Evidence that this requirement has been met includes:						
from Title XIX or Title XX of the Social Security Act, a written agreement with	1.	Grantee maintains written agreements and	Met		Not Met			
the Title XIX or the Title XX state		ensures they are kept current, as appropriate.						
agency at either the grantee level or sub-recipient agency is required (42 CFR 59.5(a)(9)].			Comments:					
		re is evidence of the grantee's oversight of sub-re	cipients/service	sites includ	ing:			
	2.	Documentation indicates that the grantee maintains oversight of its sub-recipients' agreements with Title XIX and/or Title XX.	Met	Not Met	N/A (no sub- recipients)			
		agreements with title XIX and/or title XX.						
			Comments:					

Title X Program Requirement	mplementation Strategy		Assessment				
8.4.8							
Reasonable efforts to collect charges	Evidence that this requirement has been met includes:						
without jeopardizing client confidentiality must be made.	· F Grantee has policies	<u> </u>	Met		Not Met		
,	by service sites that inclu protect client confidentia						
	cases where sending an could breach client confi	explanation of benefits	Comments:				
	here is evidence of the grant		cipients/service	sites inclu	iding:		
		Documentation at service sites demonstrates that clients' services remain confidential when billing and collecting payments.		Met	Not Met		
			Grantee				
	payments.		Site A				
			Site B				
			Site C				
			Comments:				

Title X Program Requirement	Implementation Strategy	Assessment						
8.4.9								
Voluntary donations from clients are	Evidence that this requirement has been met includes:	Evidence that this requirement has been met includes:						
permissible; however, clients must not be pressured to make donations, and donations must not be a prerequisite to the provision of services or supplies.	Grantee policies and procedures indicate if the project service sites may request and/or accept donations.	Met  Comments:		Not Met □				
	There is evidence of the grantee's oversight of sub-rec  2.	ipients/service	sites incl	uding: Not Met				
	demonstrates that clients are not pressured to make donations and that donations are not a	Grantee						
	prerequisite to the provision of services or supplies. Observation may include signage,	Site A						
	financial counseling scripts, or other evidence.	Site B						
		Site C						
		Comments:						
Additional Notes:								

# **8.5 Project Personnel**

Title X Program Requirement	Implementation Strategy	Assessment						
8.5.1								
Grantees and sub-recipients are	Evidence that this requirement has been met includes:							
personnel policies that comply with applicable Federal and State requirements, including Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act of 1973, Title I of the Americans with Disabilities Act, and the annual appropriations language.	1. A Grantee has written policies and procedures in place that provide evidence that there is no discrimination in personnel administration at its organizations and within its sub-recipient network. These policies should include, but are not to be limited to, staff recruitment, selection, performance evaluation, promotion, termination, compensation, benefits, and grievance procedures.	Met  ☐ Comments:	Not Met □					
	2. A There is evidence that the grantee monitors sub-recipients to ensure compliance with this requirement.	Met  Comments:	Not Met					

Title X Program Requirement	Imp	lementation Strategy	Assessment		
8.5.2					
Project staff should be broadly	Evid	lence that this requirement has been met includes	:		
representative of all significant elements of the population to be	1.	A Written grantee policies and procedures	Met		Not Met
served by the project, and should be		that address how the project operationalizes cultural competency.			
sensitive to, and able to deal effectively with, the cultural and other characteristics of the client population (42 CFR 59.5 (b)(10)).			Comments:		
	2.	A Documentation at service sites includes records of cultural competence training, inservices, client satisfaction surveys, or other documentation that supports culturally competent services.		Met	Not Met
			Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		

Title X Program Requirement	Implementation Strategy	Assessment					
8.5.3							
Projects must be administered by a qualified project director.  Change in Status, including Absence	Documentation that indicates any changes in project director have been submitted to and	Met	Not Met	N/A			
of Principle Investigator/Project Director and Other Key Personnel requires pre-approval by the Office of Grants Management. For more information, see HHS Grants Policy Statement, 2007 Section II-54.	approved by the Office of Grants Management.	Comments:					
8.5.4							
Projects must provide that family	Evidence that this requirement has been met includes:						
Projects must provide that family planning medical services will be performed under the direction of a physician with special training or experience in family planning (42 CFR 59.5 (b)(6)).	1. C Grantee organization demonstrates evidence that the medical/clinical services operate under the direction of a physician.	Met  Comments:		Not Met			

Title X Program Requirement	Imp	lementation Strategy	Assessment		
	2.	There is evidence (e.g., medical advisory		Met	Not Met
		committee, board, and staff meetings) indicating involvement of the Medical Director in	Grantee		
		program operations.	Site A		
			Site B		
			Site C		
			Comments:		
	3.	Curriculum vitae of the Medical Director indicates special training or experience in family planning.		Met	Not Met
			Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		

Title X Program Requirement	Imp	lementation Strategy	Assessment			
	4.	Clinic protocols are approved by the Medical Director.		Met	Not Met	
		Wedical Director.	Grantee			
			Site A			
			Site B			
			Site C			
			Comments:			
8.5.5	I		L			
Appropriate salary limits will apply as	Evidence that this requirement has been met includes:					
required by law.	1.	Documentation such as budgets and payroll	Met		Not Met	
		records that indicate that the grantee is complying with required salary limits as				
		documented in the most current family planning	Comments:			
		services Funding Opportunity Announcement (FOA).				
Additional Notes:						

# 8.6 Staff Training and Project Technical Assistance

Title X Program Requirement	Implementation Strategy	Assessment				
8.6.1						
Projects must provide for the	Evidence that this requirement has been met includes:					
orientation and in-service training of all project personnel, including the staff of sub-recipient agencies and service sites (42 CFR 59.5(b)(4)).	1. A Grantee records demonstrate the assessment(s) of staff training needs and a training plan that addresses key requirements of the Title X program and priority areas.	Met Not Met  Comments:				
	2. A Grantee maintains written records of orientation, in-service and other training attendance by project personnel.	Met Not Met  Comments:				
	3. A Grantee documentation demonstrates oversight of sub-recipient training plans and activities.	Met Not Met  Comments:				

Title X Program Requirement	Implementation Strategy	Assessment	
8.6.2			
The project's orientation/in-service training includes training on Federal/State requirements for reporting or notification of child abuse, child molestation, sexual abuse, rape, or incest, as well as on human trafficking.	Evidence that this requirement has been met includes:		
	Grantee documentation includes evidence of staff training within the current project period specific to this area which may include attendance records and certificates.	Met  ☐  Comments:	Not Met □
	Grantee documentation demonstrates oversight of sub-recipient training activities for these topics.	Met  Comments:	Not Met □
8.6.3			
The project's orientation/in-service training includes training on involving family members in the decision of minors to seek family planning services and on counseling minors on how to resist being coerced into engaging in sexual activities.	Evidence that this requirement has been met includes:		
	Grantee policies ensure that staff has received training within the current project period on state-specific reporting/notification requirements.	Met  ☐ Comments:	Not Met □

Title X Program Requirement	Impl	ementation Strategy	Assessment	
	2.	A Documentation includes training attendance records/certificates which indicate that training on family involvement counseling and sexual coercion counseling has been provided.	Met  Comments:	Not Met □
	3.	A Grantee documentation demonstrates oversight of sub-recipient training activities on these topics.	Met  Comments:	Not Met □
Additional Notes:				

# 8.7 Planning and Evaluation

Title X Program Requirement	Implementation Strategy	Assessment
8.7		
	Evidence that this requirement has been met includes:	
is competently and efficiently administered (42 CFR 59.5 (b) (6) and (7)).	Grantee has a written plan for monitoring the delivery of all services described in approved grant application including monitoring of sub-recipients.	Met Not Met  Comments:
	Grantee records document periodic assessment of work plan progress, including work plan revisions when needed.	Met Not Met  Comments:
	3. A Grantee collects and submits data for the Family Planning Annual Report (FPAR) in a timely, complete, and accurate manner.	Met Not Met  Comments:
Additional Notes:	, ,	

Title X Program Requirement	Impl	ementation Strategy	Ass	essment	
8.7 LINK TO QFP:	•		•		
When designing evaluations, projects should follow the Recommendations for Providing Quality Family Planning Services, which defines what services to provide and how to do so and thereby provides a framework by which program evaluations can be developed. Projects should also follow the QFP that defines 'quality' care and describes how to conduct quality improvement processes so that performance is monitored and improved on an ongoing basis. QI activities should be overseen by the grantee and occur at both the grantee and sub-recipient levels.				Highly Developed Fully Developed Partially Developed Being Developed Needs Development	CORE:  Quality Indicators Met  All (6)+  All (6)  Half or More (3-5)  One or More but less than half (1-2)  None (0)
	1.	A Grantee demonstrates use of FPAR data to calculate for grantee level the percentage of adolescent and adult women at risk of unintended pregnancy who use: (a) a most or moderately effective method of contraception, and (b) long-acting reversible methods of contraception.	Com	Yes □ ments:	No 🗆
	2.	A Grantee project records document the use of ongoing (i.e., at least annually) quality improvement processes related to the contraceptive use measure (see #1 above).	Com	Yes □ ments:	No 🗆
	3.	A Grantee demonstrates use of FPAR data to calculate for all service sites within the grantee's network the percentage of adolescent and adult women at risk of unintended pregnancy who use: (a) a most or moderately effective method of contraception, and (b) longacting reversible methods of contraception.	Com	Yes   ments:	No

Title X Program Requirement	Impl	ementation Strategy	Assessment	
	4.	A Grantee project records document the use of ongoing (i.e., at least annually) quality improvement processes related to the contraceptive use measure across all service sites within the grantee network (see #2 above), and a description of steps taken by the grantee, sub-recipients and service sites in response to findings.	Yes  Comments:	No
	5.	A Grantee project records demonstrate the use of data at service site level to monitor other aspects of quality care (e.g., client experience, chlamydia screening rates, timelines, and efficiency).	Yes  Comments:	No
	6.	A Grantee has implemented HIT and can demonstrate how its use has increased its ability to monitor the quality of care.	Yes  Comments:	No
Additional Notes:				

## 9. PROJECT SERVICES AND CLIENTS

Title X Program Requirement	Imple	ementation Strategy	Assessment		
9.1					
Priority for project services is to	Evide	ence that this requirement has been met includes	:		
persons from low- income families (Section 1006(c)(1), PHS Act; 42 CFR 59.5(a)(6)).		A Data submitted to the Family Planning Annual Report by the grantee demonstrates that more than half of clients served have incomes that are at or below 100% of the Federal Poverty Level (FPL).	Met  Comments:		Not Met □
	2.	A Grantee service site(s) are located in locations that are accessible for low income persons.		Met	Not Met
			Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		

Title X Program Requirement	Imp	lementation Strategy	Assessment		
9.2					
Services must be provided in a	Evid	lence that this requirement has been met includes	): -		
manner which protects the dignity of the individual (42 CFR 59.5 (a)(3)).	1.	A Grantee ensures protection of client privacy		Met	Not Met
		as evidenced in their policies and confirmed by consultant observation.	Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		
	2.	/ · panerit air ai rigina ar aire.		Met	Not Met
		documentation which outlines client's rights and responsibilities.	Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		

Title X Program Requirement	lmp	lementation Strategy	Ass	essment	
9.2 LINK TO QFP:					
quality services are client-centered, w	A core premise of Recommendations for Providing Quality Family Planning Services is that quality services are client-centered, which includes providing services in a respectful and				
culturally competent manner.				Highly Developed Fully Developed Partially Developed Being Developed Needs Development	Met All (5)+ All (5) Half or More (3-4) One or More but less than half (1-2) None (0)
	1.	A The grantee needs assessments or other documentation (including those of the subrecipients) describe populations that may be in need of culturally competent care.	Com	Yes  □ nments:	No 🗆
	2.	A The grantee has written policies and procedures that require their sites and subrecipients to receive training in culturally competent care. This should include how to meet the needs of the following key populations: LGBTQ, adolescents, individuals with limited English-proficiency, and the disabled.	Com	Yes □ nments:	No

Title X Program Requirement	lmp	lementation Strategy	Assessment	
	3.	A Documentation (e.g., training records) that demonstrates staff have received training in providing culturally competent care to populations identified in the needs assessment.	Yes  Comments:	No
	4.	A Observation of the clinic environment demonstrates that it is welcoming (i.e., Privacy, cleanliness of exam rooms, ease of access to service, fair and equitable charges for services including waiver of fees for "good cause," language assistance).	Yes  Comments:	No
	5.	A Client surveys document that clients perceive providers and other clinic staff to be respectful.	Yes  Comments:	No
Additional Notes:	1			

Title X Program Requirement	Implementation Strategy	Assessment				
9.3						
Services must be provided without	Evidence that this requirement has been met includes	Evidence that this requirement has been met includes:				
pregnancies, or marital status (42 CFR 59.5 (a)(4)).	1. A Grantee has written policies and procedures that require their service sites and any sub-recipient sites to provide service without regard to religion, race, color, national origin, disability, age, sex, number of pregnancies or marital status, and to inform staff of this requirement on an annual basis.	Met  Comments:	Not Met □			
	2. A Documentation (e.g., staff circulars, orientation documentation, training curricula) demonstrates that staff has been informed at least once during employment that services must be provided without regard to religion, race, color, national origin, disability, age, sex, number of pregnancies or marital status.	Met  Comments:	Not Met □			
	3. A Grantee has documentation of monitoring of sub-recipients for compliance with non-discrimination requirements.	Met  Comments:	Not Met □			

Title X Program Requirement	Imp	lementation Strategy	Assessment				
9.4							
Projects must provide for social	Evid	Evidence that this requirement has been met includes:					
services related to family planning including counseling, referral to and from other social and medical services agencies, and any ancillary services which may be necessary to facilitate clinic attendance (42 CFR 59.5 (b)(2)).	1.	A The grantee's needs assessment or other activities has documented the social service and medical needs of the community to be served, as well as ancillary services that are needed to facilitate clinic attendance, and identified relevant social and medical services available to help meet those needs.	Met  Comments:		Not Met		
	2.	A Grantee has a written policy that requires sub-recipients to develop and implement plans to address the related social service and medical needs of clients as well as ancillary services needed to facilitate clinic attendance.	Met  Comments:	Not Met	N/A (no sub- recipients)		
	There is evidence of the grantee's oversight of sub-recipients/service sites including:						
	3.	A Current (i.e., signed within the past 12		Met	Not Met		
		months) written collaborative agreements with relevant referral agencies exist, for example:	Grantee				
		child care agencies, transport providers, WIC programs.	Site A				
		programo.	Site B				
			Site C				
			Comments:				

Title X Program Requirement	Impl	lementation Strategy	Assessment		
	4.	Medical records indicate that referrals were		Met	Not Met
		made based on documented specific condition/issues.	Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		
9.5					
	F: 4				
Projects must provide for coordination and use of referral arrangements with	-	ence that this requirement has been met includes			
other providers of health care services, local health and welfare	1.	A Grantee has a written policy that requires sub-recipients and service sites to develop and implement plans to coordinate with and refer clients to other providers of health care	Met □		Not Met □
departments, hospitals, voluntary			Comments:		Ш
agencies, and health services projects supported by other federal programs		services, local health and welfare departments,			
(42 CFR 59.5 (b)(8).		hospitals, voluntary agencies, and health services projects supported by other federal			
		programs.			

Title X Program Requirement	lmp	lementation Strategy	Assessment				
	There is evidence of the grantee's oversight of sub-recipients/service sites including:						
	2.	A Current (i.e., signed within the past 12 months) written collaborative agreements with		Met	Not Met		
		relevant referral agencies exist, including:	Grantee				
		emergency care, HIV/AIDS care and treatment agencies, infertility specialists, and chronic care	Site A				
		management providers, and providers of other medical services not provided on-site.	Site B				
		Thedical services not provided on site.	Site C				
			Comments:				
9.6							
All grantees should assure services	Evidence that this requirement has been met includes:						
provided within their project operate within written clinical protocols that are	1.	The grantee has written policies and	Met		Not Met		
in accordance with nationally recognized standards of care,		procedures requiring sub-recipients and service sites to operate within written clinical protocols					
approved by the grantee, and signed		aligned with nationally recognized standards of care and signed by the medical director or	Comments:				
by the physician responsible for the service site.		physician responsible for the service site.					
	2.	C Documentation exists that the grantee	Met		Not Met		
		monitors all service sites and sub-recipients for the existence of current written clinical protocols					
		that are aligned with nationally recognized standards of care (QFP) and signed by the	Comments:				
		medical director or physician responsible for the					
		service sites.					

Title X Program Requirement	Imp	lementation Strategy	Ass	essment	
	3.	Medical records document that clinical		Met	Not Met
		services align with approved protocols.	Gr	antee 🗆	
			Sit	e A 🗆	
			Sit	e B 🗆	
			Sit	e C 🗆	
			Со	mments:	
9.6 LINK TO QFP:					
Grantees should follow QFP, which def	ines '	family planning" services (i.e., contraception,	Qua	lity Assessment S	Score:
		pregnancy, basic infertility services, STD scribes what services should be offered by family		Quality Rating	Quality Indicators Met
		provide those services by citing specific Federal		Highly Developed	All (4)+
and professional medical associations'				Fully Developed	All (4)
·				Partially Developed	Half or More (2-3)
				Being Developed	One or More but less than half (1-2)
				Needs Development	None (0)
	1.	Written clinical protocols include the full		Yes	No
		scope of family planning services as defined in QFP including contraception, pregnancy			
		testing, and counseling, achieving pregnancy, basic infertility, STD, and preconception health services.		nments:	

Title X Program Requirement	lmp	lementation Strategy	Assessment	
	2.	Service sites have current clinical protocols (i.e., revised within the past 12 months) that reflect the most current version of Federal and professional medical associations' recommendations for each type of service, as cited in QFP.	Yes  Comments:	No
	3.	C Documentation that clinical staff has participated in training on QFP (e.g., training available from the Title X National Training Centers).	Yes  Comments:	No □
	4.	A review of medical records and/or observational assessment confirms that the recommended services are provided in a manner consistent with QFP including those identified in Tables 2 and 3 on pages 22-23.	Yes  Comments:	No
Additional Notes:	1			

Title X Program Requirement	Implementation Strategy	Assessment						
9.7								
All projects must provide for medical	Evidence that this requirement has been met includes:							
services related to family planning and the effective usage of contraceptive	1. C The grantee has written policies and	Met		Not Met				
devices and practices (including	procedures requiring sub-recipients and service sites to provide medical services related to							
physician's consultation, examination, prescription, and continuing supervision, laboratory examination, contraceptive supplies) as well as necessary referrals to other medical facilities when medically indicated (42 CFR 59.5(b)(1)).	family planning as indicated in this section. This should also be included in sub-recipient contracts.	Comments:						
This includes, but is not limited to emergencies that require referral. Efforts may be made to aid the client in finding potential resources for								
reimbursement of the referral provider,	There is evidence of the grantee's oversight of sub-re-	cipients/service	sites inclu	uding:				
but projects are not responsible for the cost of this care.	2. Current written (i.e., updated within the past		Met	Not Met				
	12 months) clinical protocols clearly indicate that the following services will be offered to	Grantee						
	female, male and adolescent clients as appropriate: a broad range of contraceptives,	Site A						
	pregnancy testing and counseling, services to	Site B						
	assist with achieving pregnancy, basic infertility services, STD services, and preconception	Site C						
	health services.	Comments:						

Title X Program Requirement	Imp	lementation Strategy	Assessment		
	3.	Breast and cervical cancer screening are		Met	Not Met
		available on-site and offered to female clients.	Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		
	4.	C Written collaborative agreements with		Met	Not Met
		relevant referral agencies exist, including: emergency care, HIV/AIDS care and treatment	Grantee		
		providers, infertility specialists, primary care and chronic care management providers.	Site A		
		and an arrangement provides	Site B		
			Site C		
			Comments:		

Title X Program Requirement	Impl	lementation Strategy	Assessment					
	5.	Medical records document that clients are		Met	Not Met			
		provided referrals when medically indicated.	Grantee					
		Site A						
		s	Site B					
			Site C					
			Comments:					
9.8								
All Projects must provide a broad	Evid	Evidence that this requirement has been met includes:						
range of acceptable and effective medically approved family planning	1.	C Medical record reviews demonstrate that		Met	Not Met			
methods (including natural family planning methods) and services		clients are provided a broad range of acceptable and effective medically approved	Grantee					
(including infertility services and		family planning methods (including natural family planning methods) and services	Site A					
services for adolescents).		(including infertility services and services for	Site B					
If an organization offers only a single method of family planning, it may		adolescents).	Site C					
participate as part of a project as long			Comments:					
as the entire project offers a broad range of family planning services. (42								
CFR 59.5(a)(1)).								

Title X Program Requirement	Imp	lementation Strategy	Assessment		
	2.	Services provided by the grantee and each sub-recipient, when viewed in its entirety provide, a broad range of effective and medically (FDA-approved) methods and services.	Met  Comments:		Not Met □
	3.	C A review of the current stock of		Met	Not Met
		contraceptive methods demonstrates that a broad range of methods, including LARCs, are available onsite (optimally) or by referral.	Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		

Title X Program Requirement	Impl	ementation Strategy	Assessment			
	4.	Clinic protocols state that the following		Met	Not Met	
		services will be provided to female, male, and adolescent clients as appropriate:	Grantee			
		contraception, pregnancy testing and counseling, services for achieving pregnancy,	Site A			
		basic infertility services, STD services, and	Site B			
		preconception health services.	Site C			
			Comments:			
	5.	Grantee documentation indicates oversight of sub-recipients/service sites compliance with this section.	Met		Not Met	
			Comments:			
Additional Notes:			l			

Title X Program Requirement	lmp	lementation Strategy	Assessment			
9.8 Link to QFP:						
The QFP notes the special needs of adolescent clients and recommends ways to address those needs, e.g., how to tailor contraceptive counseling for adolescents and ways to make services more youth-friendly.  The QFP also notes the need to offer a broad range of contraceptive methods, and that this is an important part of providing client-centered care that respects the individual's choice. Projects should have a system in place to ensure continuous access to a broad range of FDA-approved contraceptive methods, optimally on-site.				Highly Developed Fully Developed Partially Developed Being Developed	All (5)+ All (5) Half or More (3-4) One or More but less than half (1-2)	
	1.	C All services listed in QFP are offered to female and male clients, including adolescents as specified in clinical protocols.	Com	Yes  mments:	None (0)	
	2.	A review of clinic/pharmacy records demonstrates no stock-out of any contraceptive method that is routinely offered occurred during the past 6 months.	Com	Yes	No	
	3.	A review of the service site's FPAR data demonstrates that the proportion of adolescents served is close to or above the national average (as documented in FPAR).	Com	Yes □ nments:	No	

Title X Program Requirement	Implementation Strategy	Assessment
	4. A review of the service site's FPAR data demonstrates that the proportion of males receiving family planning services is close to or above the national average.	Yes No  Comments:
	5. C A review of medical records confirms that adolescents have been counseled about abstinence, the use of condoms and other contraceptive methods, including LARCs.	Yes No
Additional Notes:		

Title X Program Requirement	Imp	lementation Strategy	Assessment					
9.9								
Services must be provided without the	Evid	vidence that this requirement has been met includes:						
imposition of any durational residency requirement or requirement that the	1.	A The grantee has a written policy stating that	Met		Not Met			
client be referred by a physician (42		sub-recipient and service sites must provide services without the imposition of any durational						
CFR 59.5(b)(5)).		residence requirement or a requirement that the client be referred by a physician.	Comments:					
	The	There is evidence of the grantee's oversight of sub-recipients/service sites including:						
	2.	A Written clinic policies explicitly address this requirement.		Met	Not Met			
			Grantee					
			Site A					
			Site B					
			Site C					
			Comments:					

Title X Program Requirement	Impl	lementation Strategy	Assessment		
9.10					
	Evid	ence that this requirement has been met includes	:		
diagnosis and counseling to all clients in need of these services (42 CFR	1.	C The grantee has a written policy requiring	Met		Not Met
59.5(a)(5)).		its sites and all sub-recipients to provide pregnancy diagnosis and counseling services to			
		all clients in need of these services.	Comments:		
	2.	Clinic inventory and medical records review demonstrates that pregnancy testing and counseling is available and offered to all clients in need of these services.		Met	Not Met
			Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		
Additional Notes:					

Title X Program Requirement	Imp	lementation Strategy	Ass	essment	
9.10 Link to QFP:					
Projects should follow QFP, which describes how to provide pregnancy testing and counseling services, and cites the clinical recommendations of the relevant professional medical associations.				Highly Developed Fully Developed Partially Developed Being Developed Needs Development	CORE:  Quality Indicators Met  All (5)+  All (5)  Half or More (3-4)  One or More but less than half (1-2)  None (0)
	1.	Written clinical protocols regarding pregnancy testing and counseling are in accordance with the recommendations presented in QFP, including reproductive life planning discussions and medical histories that include any coexisting conditions.	Con	Yes □ nments:	No □
	2. Chart review demonstrates that clients with a positive pregnancy test who wish to continue the pregnancy receive initial prenatal counseling and are assessed regarding their social support.	Con	Yes □ nments:	No 🗆	
	3.	Chart review demonstrates that clients with a negative pregnancy test who do not want to become pregnant are offered same day contraception, if appropriate.	Con	Yes □ nments:	No

Title X Program Requirement	Implementation Strategy		Assessment		
	4.	C Staff have received training on pregnancy counseling recommendations presented in QFP at least once during employment	Yes  Comments:	No □	
	5.	C Observation and/or medical record review demonstrates counseling recommendations in accordance with the principles presented in QFP including reproductive life planning discussions.	Yes  Comments:	No 🗆	
Additional Notes:					

Title X Program Requirement	Implementation Strategy	Assessment		
9.11				
Projects must offer pregnant women the opportunity to be provided information and counseling regarding each of the following options:	<ol> <li>The grantee has written policies and procedures requiring its sites and all sub-</li> </ol>	Met		Not Met
<ul> <li>Prenatal care and delivery;</li> <li>Infant care, foster care, or adoption; and</li> <li>Pregnancy termination.</li> </ul>	recipients to offer options counseling to pregnant women.	Comments:		
If requested to provide such	2. C Written clinical protocols ensure that		Met	Not Met
information and counseling, provide neutral, factual information and	pregnant clients are offered neutral, factual information, and non-directive counseling about	Grantee		
nondirective counseling on each of the options, and referral upon request,	all three pregnancy options except for those options that the woman does not wish to receive information, and that referrals requested by the client are provided to her.	Site A		
except with respect to any options(s) about which the pregnant woman indicates she does not wish to receive		Site B		
		Site C		
such information and counseling (42 CFR 59.5(a)(5)).		Comments:		

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Title X Program Requirement	lmp	lementation Strategy	Assessment		
	3.	document that clients were offered the		Met	Not Met
			Grantee		
		counseling about all three pregnancy options, except those for which the woman did not want	Site A		
		to receive information and counseling.	Site B		
			Site C		
		С	Comments:		
	4.	C Medical records of pregnant clients document that referrals were made as requested.		Met	Not Met
			Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		

Title X Program Requirement	Implementation Strategy	Assessment					
9.12							
Title X grantees must comply with	Evidence that this requirement has been met includes:						
applicable legislative mandates set out in the HHS appropriations act. Grantees must have written policies in place that address these legislative mandates:  "None of the funds appropriated in the Act may be made available to any entity under Title X of the Public Health Service Act unless the applicant for the award certifies to the Secretary of Health and Human Services that it encourages family participation in the decision of minors	1. A The grantee has written policy and procedures requiring their sites and all subrecipients to inform their staff periodically that:  (a) clinic staff must encourage family participation in the decision of minors to seek FP services, (b) minors must be counseled on how to resist attempts to coerce them into engaging in sexual activities, and (c) State law must be followed requiring notification or the reporting of child abuse, child molestation, sexual abuse, rape, or incest. Grantee contracts with sub-recipients include these requirements.	Met  Comments:		Not Met			
to seek family planning services and that it provides counseling to minors	2. A Documentation (e.g., staff circulars, training		Met	Not Met			
on how to resist attempts to coerce minors into engaging in sexual	curricula) demonstrates that all staff has been formally informed about items 1a-c above at	Grantee					
activities."	least once during the current project period.	Site A					
"Notwithstanding any other provision		Site B					
of law, no provider of services under Title X of the Public Health Service Act shall be exempt from any State law requiring notification or the reporting of child abuse, child molestation, sexual abuse, rape, or incest."		Site C Comments:					

Title X Program Requirement	Imp	ementation Strategy	Assessment		
	3.	encouragement regarding family participation in their decision to seek family planning services		Met	Not Met
			Grantee		
			Site A		
	being coerced into engaging in sexual activities.	Site B			
			Site C		
			Comments:		

## **10. CONFIDENTIALITY**

Title X Program Requirement	Implementation Strategy	Assessment				
10						
Every project must have safeguards to ensure client confidentiality. Information obtained by project staff about an individual receiving services may not be disclosed without the individual's documented consent, except as required by law or as may be necessary to provide services to the individual, with appropriate	The grantee has a written policy requiring that all service sites and sub-recipients safeguard client confidentiality. Grantee	Met		Not Met		
	contracts with sub-recipients include this requirement.	Comments:				
safeguards for confidentiality. Information may otherwise be	2. A Documentation (e.g., staff circulars, new		Met	Not Met		
disclosed only in summary, statistical, or other form that does not identify the	employee orientation documentation, training curricula) demonstrates that staff has been	Grantee				
individual (42 CFR 59.11).	informed at least once during the current project period about policies related to preserving client					
	confidentiality and privacy.	Site B				
		Site C				
		Comments:				

Title X Program Requirement	lmp	lementation Strategy	Assessment		
	3.	A Clinical protocols and policies have		Met	Not Met
		statements related to client confidentiality and privacy.	Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		
	4.	A The health records system has safeguards in place to ensure adequate privacy, security and appropriate access to personal health		Met	Not Met
			Grantee		
		information.	Site A		
			Site B		
			Site C		
			Comments:		

Title X Program Requirement	Impl	lementation Strategy	Assessment		
	5.	A There is evidence that HIPAA privacy forms		Met	Not Met
		are provided to clients and signed forms are collected as required.	Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		
	6.	manner and note any limitations that may		Met	Not Met
			Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		

Title X Program Requirement	Impl	lementation Strategy	Assessment		
	7.	F Third party billing is processed in a manner		Met	Not Met
		or young adults seeking confidential services, or individuals for whom billing the policy holder could result in interpersonal violence).	Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		
	8.	enerit education materials (eigh, posters,		Met	Not Met
		videos, flyers) noting the client's right to confidential services are available to clients.	Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		

Title X Program Requirement	Imp	lementation Strategy	Α	ssessment		
	9.	The physical layout of the facility ensures that client services are provided in a manner that allows for confidentiality and privacy.			Met	Not Met
				Grantee		
				Site A		
				Site B		
				Site C		
				Comments:		
Additional Notes:						

# 11. COMMUNITY PARTICIPATION, EDUCATION, AND PROJECT PROMOTION

Title X Program Requirement	Implementation Strategy	Assessment				
11.1						
Title X grantees and sub-recipient agencies must provide an opportunity for participation in the development, implementation, and evaluation of the project by persons broadly representative of all significant elements of the population to be served; and by persons in the community knowledgeable about the community's needs for family planning	Evidence that this requirement has been met includes	Evidence that this requirement has been met includes:				
	1. A The grantee has a written policy and procedures in place for ensuring that there is an opportunity for community participation in developing, implementing, and evaluating the project plan. Participants should include individuals who are broadly representative of the population to be served, and who are knowledgeable about the community's needs	Met Not Met  Comments:				
services (42 CFR 59.5(b)(10)).	for family planning services.  2. A The community engagement plan: (a) engages diverse community members including adolescents and current clients, and (b) specifies ways that community members will be involved in efforts to develop, assess, and/or evaluate the program.	Met Not Met  Comments:				
	3. A Documentation demonstrates that the community engagement plan has been implemented (e.g., reports, meeting minutes, etc.)	Met Not Met  Comments:				

Title X Program Requirement	Implementation Strategy	Assessment
11.2		
Projects must establish and	Evidence that this requirement has been met includes	:
implement planned activities to facilitate community awareness of and access to family planning services (42 CFR 59.5(b)(3)). Each family planning project must provide for community education programs (42 CFR 59.5(b)(3)).	1. A Documentation demonstrates that the grantee conducts periodic assessment of the needs of the community with regard to their awareness of and need for access to family planning services.	Met Not Met  ☐ ☐  Comments:
The community education program(s) should be based on an assessment of the needs of the community and should contain an implementation and evaluation strategy.	2. A Grantee has a written community education and service promotion plan that has been implemented (e.g., media spots/materials developed, event photos, participant logs, and monitoring reports). The plan: (a) states that the purpose is to enhance community understanding of the objectives of the project, make known the availability of services to potential clients, and encourage continued participation by persons to whom family planning may be beneficial, (b) promotes the use of family planning among those with unmet need, (c) utilizes an appropriate range of methods to reach the community, and (d) includes an evaluation strategy.	Met Not Met  Comments:
	3. A Documentation that evaluation has been conducted, and that program activities have been modified in response.	Met Not Met  Comments:

Title X Program Requirement	Implementation Strategy	Assessment					
11.3							
Community education should serve to	vidence that this requirement has been met includes:						
enhance community understanding of the objectives of the project, make known the availability of services to potential clients, and encourage continued participation by persons to whom family planning may be beneficial (42 CFR 59.5 (b)(3).	1. A The grantee has developed a community education and service promotion plan that: (a) states that the purpose is to enhance community understanding of the objectives of the project, make known the availability of services to potential clients, and encourage continued participation by persons to whom family planning may be beneficial, (b) promotes the use of family planning among those with unmet need, (c) utilizes an appropriate range of methods to reach the community, and (d) includes an evaluation strategy.	Met  Comments:	Not Met □				
	2. A There is documentation that the plan has been implemented and evaluated.	Met  Comments:	Not Met □				
Additional Notes:							

## 12. INFORMATION AND EDUCATION MATERIALS APPROVAL

Title X Program Requirement	Implementation Strategy	Assessment				
12.1		•				
Title X grantees and sub-recipient	Evidence that this requirement has been met includes:					
agencies are required to have a review and approval process, by an Advisory Committee, of all informational and educational materials developed or made available under the project prior to their distribution (Section 1006 (d)(2), PHS Act; 42 CFR 59.6(a)).	1. A Grantee has policies and procedures that ensure materials are reviewed prior to being made available to the clients that receive services within the project. If a grantee subcontracts for services, the grantee must ensure that sub-recipients have a process in place that meets this requirement.	Met  ☐ Comments:		Not Met □		
	2. A Committee meeting minutes (grantee or		Met	Not Met		
	sub-recipient, as applicable) demonstrate the process used to review and approve materials.	Grantee				
		Site A				
		Site B				
		Site C				
		Comments:				

Title X Program Requirement	Imp	lementation Strategy	Assessment		
12.2					
The committee must include	Evid	ence that this requirement has been met includes			
individuals broadly representative (in terms of demographic factors such as	1.	A The grantee has established a project	Met		Not Met
race, color, national origin,		advisory board that is comprised of members who are broadly representative of the			
handicapped condition, sex and age) of the population or community for which the materials are intended (42 CFR 59.6 (b)(2).		population served.	Comments:		
	2.	A If a grantee sub-contracts for services, the	Met	Not Met	N/A
		grantee must ensure that sub-recipients have a process in place that meets this requirement.			(no sub- recipients)
			☐ Comments:		
			Comments.		
		A Grantee (and/or sub-recipients)		Met	Not Met
		documentation (meeting minutes, lists of board members, etc.) demonstrates this requirement	Grantee		
		has been met.	Site A		
			Site B		
			Site C		
			Comments:		

Title X Program Requirement	Impl	lementation Strategy	Assessment		
12.3					
Each Title X grantee must have an	Evid	vidence that this requirement has been met includes:			
Advisory Committee of five to nine members, except that the size provision may be waived by the Secretary for good cause shown (42 CFR 59.6 (b)(1)). The Advisory Committee must review and approve all informational and educational (I&E) materials developed or made	1.	A Grantee has policies and procedures	Met	Not Met	
		addressing this element.			
			Comments:		
available under the project prior to	2.	A Grantee maintains and updates	Met	Not Met	
their distribution to assure that the materials are suitable for the		Lists/Rosters of Advisory Committee members.			
population and community for which			Comments:		
they are intended and to assure their consistency with the purposes of Title					
X (Section 1006(d)(1), PHS Act; 42					
CFR 59.6(a)).	3.	A Grantee maintains Advisory Committee	Met	Not Met	
		written meeting minutes.			
			Comments:		
	4.	A Advisory committee minutes indicate that	Met	Not Met	
		the committee is active.			
			Comments:		

Title X Program Requirement	Implementation Strategy	Assessment
12.4		
The grantee may delegate I&E	Evidence that this requirement has been met includes	:
functions for the review and approval of materials to sub-recipient agencies; however, the oversight of the I&E review process rests with the grantee.	1. A Grantee policies and procedures indicate responsibility for this element. If the grantee chooses to delegate this activity, grantee policies indicate how the grantee will maintain oversight of the process.	Met Not Met  ☐  Comments:
	2. A Grantee documentation indicates that an oversight process has been implemented by the grantee.	Met Not Met  Comments:

Title X Program Requirement	Implementation Strategy	Assessment
12.5		
The Advisory Committee(s) may	Evidence that this requirement has been met includes	s:
delegate responsibility for the review of the factual, technical, and clinical accuracy to appropriate project staff; however, final responsibility for approval of the I&E materials rests with the Advisory Committee.	Grantee Policies and procedures specify how the factual, technical, and clinical accuracy components of the review are assured.	Met Not Met  Comments:
	2. A If review of factual, technical, and /or clinical content has been delegated, there is evidence of advisory committee oversight and final approval.	Met Not Met  Comments:

Title X Program Requirement	Implementation Strategy	Assessment			
12.6					
The I&E Advisory Committee(s) must:  Consider the educational and	Evidence that this requirement has been met includes:				
<ul> <li>cultural backgrounds of the individuals to whom the materials are addressed;</li> <li>Consider the standards of the population or community to be served with respect to such materials;</li> </ul>	1. A Grantee policies and procedures document that the required elements of this section are addressed.	Met Not Met  Comments:			
<ul> <li>Review the content of the material to assure that the information is factually correct;</li> <li>Determine whether the material is suitable for the population or community to which it is to be made available; and</li> <li>Establish a written record of its determinations (Section 1006(d), PHS Act; 42 CFR 59.6(b)).</li> </ul>	Meeting minutes and/or review forms document that all required components are addressed.	Met Not Met  Comments:			
Additional Notes:					

## 13. ADDITIONAL ADMINISTRATIVE REQUIREMENTS

Title X Program Requirement	Implementation Strategy	Assessment					
13.1							
Facilities and Accessibility of Services	Evidence that this requirement has been met includes:						
HHS Office for Civil Rights policy document, Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient	Grantee policies assure language translation services are readily provided when needed.	Met  Comments:		Not Met □			
Persons (August 4, 2003) (HHS Grants Policy Statement 2007, II-23).	Service site documentation indicates that		Met	Not Met			
	staff is aware of policies and processes that exist to access language translation services	Grantee					
	when needed.	Site A					
		Site B					
		Site C					
		Comments:					

Title X Program Requirement	Impl	lementation Strategy	Assessment		
Projects may not discriminate on the	Evid	ence that this requirement has been met includes			
basis of disability and, when viewed in their entirety, facilities must be readily	3.	A Grantee policies and procedures ensure	Met		Not Met
accessible to people with disabilities		access to services for individuals with disabilities at their sites and at all sub-recipient			
(45 CFR 84).		sites.	Comments:		
	4.	A Grantee maintains documentation of any	Met		Not Met
		accommodations made for disabled individuals.			
			Comments:		
	5. A Project sites are free from obvious structural or other barriers that would prevent disabled individuals from accessing services.			Met	Not Met
		Grantee			
			Site A		
			Site B		
			Site C		
			Comments:		

Title X Program Requirement	lmp	ementation Strategy	Assessment		
13.1 LINK TO QFP:					
	When developing written policies that meet these requirements, projects implement the ecommendations presented in "Appendix E" of the QFP.				COTE: Quality Indicators Met
Strategies that can make information more accessible for clients with Limited English Proficiency include:  • Presenting information in the client's primary language.  • Providing translation services.  Ensure that information is culturally appropriate and reflects the client's beliefs, ethnic background, and cultural practices.				Highly Developed Fully Developed Partially Developed Being Developed Needs Development	All (5)+ All (5) Half or More (3-4) One or More but less than half (1-2) None (0)
sacrigicana, ana cararar practicos.	1.	A Educational materials are clear and easy to understand (e.g., 4th-6th grade reading level).	Com	Yes □ nments:	No 🗆
	2.	Observation demonstrates that information is presented in a way that emphasizes essential points (e.g., limits the amount of information presented appropriately).	Yes  Comments:		No
	3.	C Observation demonstrates information on risks and benefits is communicated in a way that is easily understood (e.g., using natural frequencies and common denominators).	Com	Yes  □ nments:	No

## Title X Program Review Tool v2 - 2016

Title X Program Requirement	Imp	lementation Strategy	Assessment	
	4.	Information provided during counseling is culturally appropriate and reflects the client's beliefs, ethnic background, and cultural practices.	Yes  Comments:	No
	5.	A Educational materials are tailored to literacy, age, and language preferences of client populations.	Yes  Comments:	No
Additional Notes:				

Title X Program Requirement	Impl	lementation Strategy	Assessment					
13.2								
All grantees, sub-recipients and Title	Evid	Evidence that this requirement has been met includes:						
X clinics are required to have a written plan for the management of	1.	A Grantee disaster plans have been	Met		Not Met			
emergencies (29 CFR 1910, subpart		developed and are available to staff.						
E) and clinical facilities must meet applicable standards established by			Comments:					
Federal State and local governments (e.g. local fire, building, and licensing codes).								
	2.	A Staff can identify emergency evacuation routes.		Met	Not Met			
			Grantee					
			Site A					
		Site B						
			Site C					
			Comments:					

## Title X Program Review Tool v2 - 2016

Title X Program Requirement	lmp	lementation Strategy	Assessment		
	3.	A Staff has completed training and understands their role in an emergency or natural disaster.		Met	Not Met
			Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		
	4.	Exits are recognizable and free from barriers.		Met	Not Met
			Grantee		
			Site A		
			Site B		
			Site C		
			Comments:		

Title X Program Requirement	Impl	lementation Strategy	Assessment		
	5.	A Grantee documentation demonstrates oversight of sub-recipients and service sites compliance with these requirements.	Met  Comments:	Not Met □	
13.3	  - · .				
Projects are required to establish policies to prevent employees,		ence that this requirement has been met includes	: T		
consultants, or members of governing/advisory bodies from using their positions for purposes that are, or give the appearance of being motivated by a desire for private financial gain for themselves or others (HHS Grants Policy Statement 2007, II-7).	1.	A Grantee policies address this requirement.	Met  Comments:	Not Met □	
	2.	A There is evidence of grantee oversight of sub-recipients/service sites for compliance with this requirement.	Met  Comments:	Not Met □	

Title X Program Requirement	Implementation Strategy	Assessment				
13.4						
Research conducted within Title X projects may be subject to Department of Health and Human Services regulations regarding the protection of human subjects (45 CFR Part 46). The grantee/sub-recipient should advise their Regional Office in writing of any research projects that involve Title X clients (HHS Grants Policy Statement 2007, II-9).	Evidence that this requirement has been met includes:					
	1. A Grantee policies address this requirement.	Met  Comments:	Not Met □			
	2. A There is evidence of grantee oversight of sub-recipients/service sites for compliance with this requirement.	Met  Comments:	Not Met □			
Additional Notes:		I				